

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

04/03/2017
08:00 AM

DAVID H. YAMASAKI, Clerk of the Court
17CF0800

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11) OCDA WC16070011
12 PAUL ANDREW STANTON 11/12/62) OCDA WC15040015
D2397394) OCDA HF12110001
13)
Defendant(s))

14 The Orange County District Attorney charges that in Orange
15 County, California, the law was violated as follows:

16 COUNT 1: On or about and between June 12, 2012 and August 12,
17 2015, in violation of Section 550(a)(6) of the Penal Code
18 (CONSPIRACY TO COMMIT MEDICAL INSURANCE FRAUD), a FELONY, PAUL
19 ANDREW STANTON did unlawfully conspire with TANYA MORELAND KING
20 AND CHRISTOPHER KING AND OTHER UNKNOWN INDIVIDUALS, with the
21 intent to defraud, to make a false and fraudulent claim to
22 WORKERS COMPENSATION INSURANCE CARRIERS IN CALIFORNIA for
23 payment of a health care benefit in an amount exceeding nine
hundred fifty dollars (\$950). It is further alleged that
24 pursuant to and for the purpose of carrying out the objects and
25 purposes of the conspiracy, one and more of the conspirators
26 committed the following overt acts:

27 OVERT ACT 1

28 On or about 6/12/12, Defendant PAUL STANTON, M.D., entered into
an agreement with TANYA MORELAND KING, CHRISTOPHER KING and
their companies, King Medical Management Inc. and Monarch
Medical Group Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

OVERT ACT 2

King Medical Management formulated and paid for a 3-day supply of the compound transdermal creams manufactured by Steven's Pharmacy, located in Costa Mesa, in the County of Orange, and arranged for Steven's Pharmacy to ship these creams to Defendant PAUL STANTON, M.D.

OVERT ACT 3

Defendant PAUL STANTON, M.D., prescribed the transdermal compound creams manufactured by Steven's Pharmacy to his workers' compensation patients.

OVERT ACT 4

Defendant PAUL STANTON, M.D., did not customize these compound transdermal creams to each workers' compensation patient and used the formula given to him by Monarch Medical Group.

OVERT ACT 5

Defendant PAUL STANTON, M.D., then provided the billing information for each workers' compensation patient to King Medical Management Inc. to bill for the dispensing of these creams from his office.

OVERT ACT 6

King Medical Management Inc. billed workers' compensation carriers in excess of \$190 per cream even though the cream only cost \$16.

OVERT ACT 7

From 6/12/12 to 5/13/15, King Medical Management Inc., paid Defendant PAUL STANTON, M.D., \$50 per compound cream dispensed to his workers' compensation patients.

/

/

/

/

/

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

OVERT ACT 8

From 5/13/15 to 8/12/15, King Medical Management Inc., paid Defendant PAUL STANTON, M.D., 80% of the profits from the amount collected from the workers' compensation carrier for each of the 3-day of the compound creams he dispensed to his workers' compensation patients.

OVERT ACT 9

In return for the money he received from the billing on the 3-day supply of the transdermal creams, Defendant PAUL STANTON, M.D., was also required to write a prescription for the 30-day supply of transdermal compound creams which were shipped directly to his workers' compensation patients by Steven's Pharmacy in Costa Mesa, located in the County of Orange.

OVERT ACT 10

In order to give the appearance of legitimacy to the compounded transdermal creams that Defendant PAUL STANTON, M.D., prescribed to his patients, on 1/21/15 he signed a letter that Monarch Medical Group provided to him, which he did not prepare himself, purporting to give instructions to the pharmacy and customize the formula for the compound creams.

OVERT ACT 11

Monarch Medical Group then billed the workers compensation insurance carriers well in excess of \$700 for each compounded transdermal cream that was shipped by Steven's Pharmacy, located in Costa Mesa, to each of Defendant PAUL STANTON's patients, even though Monarch Medical Group only paid Steven's Pharmacy \$40 per compound cream to manufacture.

OVERT ACT 12

Between 6/12/12 and 8/12/15, Monarch Medical Group and King Medical Management paid Defendant PAUL STANTON, M.D., in excess of \$11,000 and at least one payment was issued in the amount of \$400 on 5/13/15 on Check #6679.

/

1 COUNT 2: On or about and between March 30, 2014 and August 12,
2 2015, in violation of Section 549 of the Penal Code (FALSE AND
3 FRAUDULENT CLAIM), a FELONY, PAUL ANDREW STANTON did unlawfully
4 solicit, accept, and refer business to and from KING MEDICAL
5 MANAGEMENT INC. AND MONARCH MEDICAL GROUP INC, with the
6 knowledge that, and with reckless disregard for whether KING
7 MEDICAL MANAGEMENT INC. AND MONARCH MEDICAL GROUP INC intended
8 to violate Penal Code section 550 and Insurance Code section
9 1871.4. (COMPOUND TRANSDERMAL CREAMS FROM STEVEN'S PHARMACY)

10 COUNT 3: On or about and between March 30, 2014 and September
11 01, 2015, in violation of Section 650 of the Business &
12 Professions Code (REBATES FOR PATIENT REFERRALS), a FELONY, PAUL
13 ANDREW STANTON, a person licensed under the Healing Arts
14 Division of this Code and the Chiropractic Initiative Act, did
15 unlawfully offer, deliver, receive, and accept any rebate,
16 refund, commission, preference, patronage dividend, discount,
17 and other consideration as compensation and inducement for
18 referring patients, clients, and customers to STEVEN'S PHARMACY,
19 TANYA MORELAND KING AND HER BUSINESS MONARCH MEDICAL GROUP INC..

20 COUNT 4: On or about and between April 04, 2013 and June 24,
21 2014, in violation of Section 550(b)(3) of the Penal Code
22 (INSURANCE FRAUD), a FELONY, PAUL ANDREW STANTON, with the
23 intent to defraud, did unlawfully conceal and knowingly fail to
24 disclose, and did knowingly assist with another person to
25 conceal and fail to disclose the occurrence of an event and a
26 fact that affected the initial and continued material right and
27 entitlement of BERKSHIRE HATHAWAY HOMESTEAD COMPANIES to an
28 insurance benefit and payment, and to the amount of a benefit
and payment to which BERKSHIRE HATHAWAY HOMESTEAD COMPANIES was
entitled, namely: DEFENDANT HAD A FINANCIAL INTEREST IN AND
RECEIVED FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO
HIS WORKERS' COMPENSATION PATIENTS.

24 /
25 /
26 /
27 /
28 /
/
/

1 COUNT 5: On or about and between April 10, 2013 and July 22,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, PAUL ANDREW STANTON, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of ICW GROUP INSURANCE GROUP to an insurance benefit
9 and payment, and to the amount of a benefit and payment to which
10 ICW GROUP INSURANCE GROUP was entitled, namely: DEFENDANT HAD A
11 FINANCIAL INTEREST IN AND RECEIVED FINANCIAL INCENTIVES TO
12 PRESCRIBE COMPOUND CREAMS TO HIS WORKERS' COMPENSATION PATIENTS.
13

14 COUNT 6: On or about and between July 10, 2013 and January 22,
15 2014, in violation of Section 550(b)(3) of the Penal Code
16 (INSURANCE FRAUD), a FELONY, PAUL ANDREW STANTON, with the
17 intent to defraud, did unlawfully conceal and knowingly fail to
18 disclose, and did knowingly assist with another person to
19 conceal and fail to disclose the occurrence of an event and a
20 fact that affected the initial and continued material right and
21 entitlement of AIG to an insurance benefit and payment, and to
22 the amount of a benefit and payment to which AIG was entitled,
23 namely: DEFENDANT HAD A FINANCIAL INTEREST IN AND RECEIVED
24 FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO HIS
25 WORKERS' COMPENSATION PATIENTS.
26

27 COUNT 7: On or about and between January 27, 2014 and February
28 26, 2014, in violation of Section 550(b)(3) of the Penal Code
(INSURANCE FRAUD), a FELONY, PAUL ANDREW STANTON, with the
intent to defraud, did unlawfully conceal and knowingly fail to
disclose, and did knowingly assist with another person to
conceal and fail to disclose the occurrence of an event and a
fact that affected the initial and continued material right and
entitlement of STATE COMPENSATION INSURANCE FUND to an insurance
benefit and payment, and to the amount of a benefit and payment
to which STATE COMPENSATION INSURANCE FUND was entitled, namely:
DEFENDANT HAD A FINANCIAL INTEREST IN AND RECEIVED FINANCIAL
INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO HIS WORKERS'
COMPENSATION PATIENTS. (PATIENT HENRY Q.).

27 /
28 /
/
/

1 COUNT 8: On or about and between June 12, 2013 and July 15,
2 2015, in violation of Section 550(b)(3) of the Penal Code
3 (INSURANCE FRAUD), a FELONY, PAUL ANDREW STANTON, with the
4 intent to defraud, did unlawfully conceal and knowingly fail to
5 disclose, and did knowingly assist with another person to
6 conceal and fail to disclose the occurrence of an event and a
7 fact that affected the initial and continued material right and
8 entitlement of YORK RISK SERVICES GROUP to an insurance benefit
9 and payment, and to the amount of a benefit and payment to which
10 YORK RISK SERVICES GROUP was entitled, namely: DEFENDANT HAD A
11 FINANCIAL INTEREST IN AND RECEIVED FINANCIAL INCENTIVES TO
12 PRESCRIBE COMPOUND CREAMS TO HIS WORKERS' COMPENSATION PATIENTS.

13 COUNT 9: On or about and between August 14, 2013 and December
14 23, 2014, in violation of Section 550(b)(3) of the Penal Code
15 (INSURANCE FRAUD), a FELONY, PAUL ANDREW STANTON, with the
16 intent to defraud, did unlawfully conceal and knowingly fail to
17 disclose, and did knowingly assist with another person to
18 conceal and fail to disclose the occurrence of an event and a
19 fact that affected the initial and continued material right and
20 entitlement of ZURICH to an insurance benefit and payment, and
21 to the amount of a benefit and payment to which ZURICH was
22 entitled, namely: DEFENDANT HAD A FINANCIAL INTEREST IN AND
23 RECEIVED FINANCIAL INCENTIVES TO PRESCRIBE COMPOUND CREAMS TO
24 HIS WORKERS' COMPENSATION PATIENTS.

25 I declare under penalty of perjury, on information and belief,
26 that the foregoing is true and correct.

27 Dated 04-03-2017 at Orange County, California.

28 KS/AC 17F00360

29 TONY RACKAUCKAS, DISTRICT ATTORNEY

30 by: /s/ SHADDI KAMIABIPOUR

31 SHADDI KAMIABIPOUR, Deputy District Attorney

32 RESTITUTION CLAIMED

33 [] None

34 [] \$ _____

35 [X] To be determined

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BAIL RECOMMENDATION:

PAUL ANDREW STANTON - \$ 30,000.00

NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE
 GENERAL MISDEMEANOR GUILTY PLEA FORM

FILED
 COURT CLERK
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF ORANGE
 CENTRAL JUSTICE CENTER
 FEB 01 2018
 DAVID H. YAMASAKI, Clerk of the Court
 BY: N. RODRIGUEZ DEPUTY

CASE NO. 17EF0800 PEOPLE vs. Paul A. Stanton

1. My true full name is Paul Andrew Stanton.
2. I understand that I am pleading **GUILTY** / **NOLO CONTENDERE** and admitting the following offenses, prior convictions and special punishment allegations, with the maximum punishment indicated below:

CT	CHARGE	PRIORS (Date)	ALLEGATIONS	MAX SENTENCE JAIL/FINES
<u>2</u>	<u>PC 549-17(b)</u>	<u>-</u>		<u>1 yr. / \$50k.</u>
<u>Remaining Counts to be Dismissed on motion of the People w/ A HARVEY WARRANT</u>				

3. I understand I am also charged with a violation of probation in Case No. ~~3~~

RIGHTS AND WAIVERS

4. I understand I have the following constitutional rights, which I am waiving and giving up by entering my plea, and, if applicable, by my admission of a probation violation:
- 4a. I have the right to be represented by an attorney at all stages of the proceedings until the case is completed. If I cannot afford an attorney, one will be appointed to represent me. (For defendants without an attorney: I am aware that there are dangers and disadvantages of representing myself and there may be a value in obtaining advice from an attorney in this matter but I knowingly and voluntarily waive and give up my right to an attorney and choose to represent myself.) 4. PS
 - 4b. I have the right to a speedy and public trial by a jury or a judge, and if charged with a probation violation, the right to a hearing before a judge. I waive and give up this right. 4a. PS
 - 4c. I have the right to confront the witnesses against me and to cross examine them. I waive and give up this right. 4b. PS
 - 4d. I have the right to testify on my own behalf but I cannot be compelled to be a witness against myself and may remain silent if I choose. I waive and give up this right. 4c. PS
 - 4e. I have the right to present evidence and have the Court issue subpoenas to bring into Court all witnesses and evidence favorable to me, at no cost to me. I waive and give up this right. 4d. PS
 - 4f. Under the Fourth and Fourteenth Amendments to the United States Constitution, I have a right to be free from unreasonable searches and seizures. If I am granted probation, I waive and give up this right. I agree to submit my person and property, including any residence, premises, container, or vehicle under my control, to search and seizure at any time of the day or night by any law enforcement or probation officer, with or without a warrant, and with or without reasonable cause or reasonable suspicion. 4e. PS
5. I understand I have the right to appeal an adverse ruling on a Penal Code section 1538.5 suppression motion. I waive and give up this right. 4f. PS
6. I understand that I have the right to have a delay in pronouncement of my sentence of not less than six hours and not more than five days after my plea. I waive and give up this right and agree to be sentenced at this time. 5. PS
7. **Arbuckle waiver:** I understand I have the right to be sentenced by the judge who accepts this plea. I waive and give up this right. 6. PS
8. I understand I have the right to be present for the entry of the plea of guilty or nolo contendere, and I hereby waive and give up that right. 7. PS
- ~~8.~~

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE
GENERAL MISDEMEANOR GUILTY PLEA FORM

CASE NO. 17CF0800 PEOPLE vs. Paul A. Stanton.

9. I understand I have the right to reject probation, and I hereby waive and give up that right and accept probation on the terms and conditions as imposed by the court, or as contained in the attached Sentence Recommendation form.

9. PS

9a. If the judge does not wish to follow the Prosecutor's sentence recommendation, I may withdraw my plea.

9a. PS

9b. If I violate any of the terms of probation, I may be returned to court and sentenced up to the maximum punishment as indicated in 2 above.

9b. PS

9c. I understand that I have the right to a hearing before a judicial officer to determine whether I violated the conditions of my court-ordered supervision and to determine the appropriate sanction for the violations. I hereby waive and give up this right for all violations for which the county probation department orders me to serve a "flash incarceration", which can be a period of one to ten consecutive days in the county jail. However, if I do not agree with the imposition of flash incarceration, I am preserving my right to demand a hearing. I understand the court may not deny me probation if I elect not to sign this waiver.

9c. PS

CONSEQUENCES:

10. I understand that some possible consequences of my plea and admissions are as follows:

10a. There will be state penalty assessments added to any fines imposed by the court.

10a. PS

10b. I will be ordered to pay a minimum of \$100 and a maximum of \$1,000 to the State Restitution Fund unless the court makes a finding of "compelling and extraordinary reasons" for waiving this fine.

10b. PS

10c. I will be ordered to pay a minimum of \$100 and a maximum of \$1,000 probation revocation restitution fine pursuant to Penal Code section 1202.44. The restitution fine will be stayed but will be payable upon revocation of probation.

10c. PS

10d. If I am not a citizen of the United States, the plea or my conviction for the offense(s) charged will have the consequence of deportation, exclusion from admission to the United States, and denial of naturalization pursuant to the laws of the United States.

10d. PS

10e. If I am charged and convicted of a similar offense in the future, my plea today may be used to increase my punishment for the new offense.

10e. PS

10f. If I am presently on probation or parole for any previous conviction, my plea today may cause me to be in violation of that probation or parole and result in additional penalties and/or punishment.

10f. PS

~~10g. There may be additional consequences to my plea, as follows:~~

~~10g.~~

~~I may be required to register as a sex offender as required by Penal Code section 290.~~

~~I may be required to register as a drug offender as required by Health and Safety section 11500.~~

~~10h. The Department of Motor Vehicles may take action and may suspend my driver's license for specified drug, alcohol offenses and vandalism, including the following:~~

~~EVERYONE convicted of Penal Code section(s) 594, 594.3, or 594.4 (Vandalism): 1 year suspension.~~

~~UNDER 21 years of age – Suspended for 1 year for violation of Penal Code section(s) 647f, 192.5; Health and Safety Code sections involving dangerous drugs, controlled substances, and alcohol; Business and Professions Code section(s) 25658, 25658.5, 25661, 25662; Vehicle Code section(s) 23222, 23224.~~

~~10h.~~

~~11. I understand I have the right to enter my plea before, and be sentenced by, a judge. I waive and give up this right and agree to enter my plea before, and be sentenced by, a commissioner or temporary judge:~~
~~_____ (enter name of Commissioner or Temporary Judge).~~

~~11.~~

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE
GENERAL MISDEMEANOR GUILTY PLEA FORM

CASE NO. 17CF0800 PEOPLE vs. Paul A. Stanton.

PLEA

12. I offer my plea and admit the listed priors and allegations freely and voluntarily. No one has made any threats, used any force against me or my family or loved ones, and no one has made any promises to me other than as on the Sentence Recommendation form.
13. I make my plea with a full understanding of all the matters set forth in the charging document and in this form. I have read, understood, and personally initialed each item herein, and I understand that the signing and filing of this form is conclusive evidence that I have pleaded **GUILTY** / **NOLO CONTENDERE** to the charges set forth.
14. Discussion with my attorney (*Leave this box blank if you are not represented by an attorney*). Before entering this plea, I have had a full opportunity to discuss with my attorney the facts of the case, the elements of the charged offenses and prior convictions (if any), any defenses that I may have, my constitutional and statutory rights and waiver of those rights, the consequences of this plea, and anything else I think is important to my case. 14. PS

15. I offer the following as a factual basis for my plea: On or between 3-30-14 to 8-12-15, I unlawfully referred business to King Medical Group and Monarch Medical Group with reckless disregard for whether they intended to commit Insurance Fraud.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: 2/1/18 SIGNED: [Signature]
(Defendant)

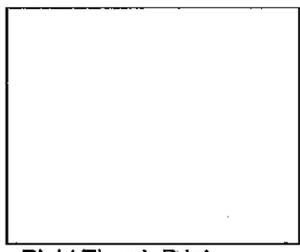
DEFENDANT'S ATTORNEY: I am the attorney of record for the defendant. I have explained each of the above rights to the defendant and answered all of the defendant's questions with regard to the plea. I have discussed the facts of the defendant's case with the defendant and explained the consequences of this plea, the elements of the offense(s), the possible defenses, and the sentence to be imposed. I concur in this plea and in the defendant's decision to waive his/her constitutional rights.

DATED: 2/1/18 SIGNED: [Signature]
(Attorney of Record)

INTERPRETER'S STATEMENT: I, _____, having been duly sworn as a court certified/registered/provisionally qualified interpreter, state that I am fluent in the _____ language. I translated the contents of this form to defendant in that language.

DATED: _____ SIGNED: _____
(Court Interpreter)

FOR THE PEOPLE:
DATED: 2/1/18 SIGNED: [Signature]
KHAMIA BIPOUR



Right Thumb Print

(Bailiff's Signature and Badge #)

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE
MISDEMEANOR SENTENCE RECOMMENDATION

CASE NUMBER 17CF0800

PEOPLE VS Paul A. Stanton

COMMUNITY SERVICE / OTHER PROGRAMS

- Complete _____ hours days of Comm. Service
 - Cal Trans Cal Trans/Physical Labor
 - In lieu of fines in lieu of jail
- Complete Graffiti Removal as to count(s) _____.
- Proof of completion due to the Clerk's Office by _____.

ALCOHOL & DRUG/PROGRAMS/DRIVERS LICENSE

- Complete 1st Offender Program:
- 3 month program 6 month 9 month
 - Complete Multiple Offender - 18 month
 - 12 hour program
 - Attend Victim Impact Counseling. Proof of completion due to the Clerk's Office by _____.
 - Attend and complete _____ self help and/or Alcoholics Anonymous meetings self help and/or Narcotics Anonymous meetings per day per week per month. Proof due by _____.
 - Court designates defendant a Habitual Offender. (VC 13350(b))
 - Driving privilege suspended for 1 year pursuant to:
 - VC 13202 (Vehicle conviction related to controlled substances)
 - VC 13202.5 (Alcohol / Drugs under the age of 21)
 - VC 13202.6 (Vandalism)
 - Driving privilege suspended for _____ year(s) pursuant to VC 13352(a)(3) (2nd DUI conviction w/in 10 years)
 - Driving privilege revoked for _____ years pursuant to VC 13352(a)(5)
 - Complete Youthful Alcohol & Drug Deterrence Program and show proof to the Clerk's Office by _____.
 - Enroll and complete PC 1210 program. Proof of enrollment due by _____. Refer to PC 1210 Addendum
 - Register with local law enforcement within 5 days from today or within 5 days upon release from custody pursuant to:
 - HS 11590 (narcotics offense)
 - PC 186.30 (gang related offense)
 - PC 457.1 (arson offense) - Lifetime registration
 - PC 290 (sex offense) - Lifetime registration
 - Submit to AIDS testing. Proof due to Department _____ by _____.
 - Attend and complete AIDS Prevention Education. Proof of completion due to the Clerk's Office by _____.

DOMESTIC VIOLENCE

- Complete Batterers' Treatment Program. (52 weeks active participation required)
 - Alcohol/Drug Component
 - Total abstinence from alcohol and drugs
 - Test alcohol and drugs (blood or urine only)
 - Parenting component
- One year Child Abuser's Program.
- Health Care Agency Perinatal Program.

DOMESTIC VIOLENCE, continued

- Other program(s) _____ weeks months years active participation required.
- Proof of enrollment due to the Court by _____.
- Comply with Court protective order.
- Defendant owns/possesses firearm(s). Relinquishment hearing set on _____.
- Surrender all firearms within 24 hours as required by law and file proof of surrender form within 48 hours with the Court.

RESTITUTION

- Make Restitution in the amount of \$ 11,000⁰⁰ or as determined through Victim Witness Probation, with interest at the rate of 10% from the date of sentencing from the date of loss.
- Pay \$ 1000 to Victim Witness Emergency Fund by 2/23/18. (PC 1203.1(i))
- Pay cost of counseling to the victim and/or children in the amount of \$ _____.
- Submit a new financial disclosure form if money is still owing on a restitution order or fine 120 days before the scheduled release from probation. File the form with the court at least 90 days before the scheduled release from probation.
- Complete and return Statement of Assets form by _____.

ADDITIONAL TERMS & CONDITIONS

- Have no contact with _____.
- Stay _____ miles yards away from _____.
- Obey all rules of Court ordered program. Do not leave the program without Court approval.
- Probation to terminate be modified to Informal status upon _____.

ADDENDUMS

- PC 1210 with Disclosure Gang Graffiti DUI Court
- _____
- _____

DEFERRED ENTRY OF JUDGMENT (PC1000)

- All checked terms and conditions will be imposed, if terminated from the PC1000 Program.

REPORT forthwith by stay date to:

- Collections Clerk's Office Probation
- OneOC Alcohol Liaison _____
- District Attorney Victim Witness

OTHER

Δ has paid full restitution to OCDA office to be distributed to Victims.

NOTICE TO DEFENDANT: After successful completion of probation, or if not placed on probation, any time after the lapse of one year from the date of pronouncement of judgment, you may petition the court to dismiss the charges under Penal Code Section 1203.4. This notice does not apply to any protective orders.

I have read, I understand, and I accept these terms and conditions of probation.

Date: 2/1/18

Defendant's Signature: [Signature]

D.A. / C.A. Signature: [Signature]

Defense Counsel Signature: [Signature]

Case Summary

Case Number: 17CF0800

OC Pay Number: 9113324

Originating Court: Central

Defendant: Stanton, Paul Andrew

Demographics:

Sex:	Male
Eyes:	Blue
Hair:	Blond
Height(ft/in) :	5'11"
Weight (lbs):	145
Race:	White
Address:	9022 SVL BX Victorville, CA 92395 USA

Identifiers:

Type	ID#
CII	A24093096
Driver's License	D2397394

Names:

Last Name	First Name	Middle Name	Type	Date of Birth
Stanton	Paul	Andrew	Real Name	11/12/1962

Case Status:

Status:	Convicted
Case Stage:	
Release Status:	Released on Own Recognizance
Warrant:	N
DMV Hold :	N
Charging Document:	Complaint
Mandatory Appearance:	Y
Owner's Resp:	N
Amendment #:	0
DA Case #:	17F00360
DR #:	WC16070011

Counts:

Seq	S/A	Violation Date	Section Statute	OL	Violation	Plea	Plea Date	Disposition	Disposition Date
1	0	06/12/2012	550(a)(6) PC	F	Fraudulent claim for health benefit	NOT GUILTY	05/04/2017	Dismissed	02/01/2018
2	0	03/30/2014	549 PC	M	False or fraudulent claims, solicitation, acceptance or referral of business	GUILTY	02/01/2018	Pled Guilty	02/01/2018
3	0	03/30/2014	650 BP	F	Unlawful Referral of Patients/Clients	NOT GUILTY	05/04/2017	Dismissed	02/01/2018
7	0	01/27/2014	550(b)(3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/04/2017	Dismissed	02/01/2018

4	0	04/04/2013	550(b) (3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/04/2017	Dismissed	02/01/2018
5	0	04/10/2013	550(b) (3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/04/2017	Dismissed	02/01/2018
6	0	07/10/2013	550(b) (3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/04/2017	Dismissed	02/01/2018
8	0	06/12/2013	550(b) (3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/04/2017	Dismissed	02/01/2018
9	0	08/14/2013	550(b) (3) PC	F	Fraudulent Insurance Benefit Claim	NOT GUILTY	05/04/2017	Dismissed	02/01/2018

Professionals:

Role	Badge	Agency	Name	Vacation Start	Vacation End
District Attorney		OCDA	Kamiabipour, Shaddi		
Retained Attorney		RETAT	Arendsen, Hamilton Edward		
Attorney General		AG	Mejia, Giovanni		

Heard Hearings:

Date	Hearing Type - Reason	Courtroom	Hearing Status	Special Hearing Result
05/04/2017	Arraignment -	C55	Heard	10 court/60 calendar days
07/13/2017	Pre Trial -	C55	Heard	
07/13/2017	Motion -	C55	Heard	Reasonable Time Waiver
11/02/2017	Pre Trial -	C55	Heard	
11/02/2017	Motion -	C55	Heard	Reasonable Time Waiver
12/14/2017	Pre Trial -	C55	Heard	
12/14/2017	Motion -	C55	Heard	Reasonable Time Waiver
01/04/2018	Pre Trial -	C55	Heard	
01/04/2018	Motion -	C55	Heard	Reasonable Time Waiver
02/01/2018	Pre Trial -	C55	Heard	waives statutory time for
02/01/2018	Motion -	C55	Heard	

Warrants:

Status	Status Date	Judge	Warrant #	Issuing Court	Reason	Release Condition	Amount
Recalled	05/04/2017	Murray, Michael	3882452	C	Warrant of Arrest	Mandatory Appearance	30000.0

Sentences:

Seq #	Sentence Date	Sentence	Disposition	
1	02/01/2018	3 years Probation	Active	02/01/2018
2	02/01/2018	Restitution	Active	02/01/2018
3	02/01/2018	Victim Witness Emergency Fund	Active	02/01/2018

Probation:

Sent Seq #	Type	Term	End Date
1	INFORMAL	3 years	01/31/2021

History:

Status	Status Date	End Date

Active	02/01/2018	01/31/2021
Conditions:		
Cond #	Ordered Date	Condition
1	02/01/2018	Violate no law.
2	02/01/2018	Obey all orders, rules, and regulations, and directives of the Court, Jail, and Probation.
3	02/01/2018	Violate no law.
4	02/01/2018	Use true name and date of birth only at all times.
5	02/01/2018	Disclose terms and conditions of probation when asked by any law enforcement or probation officer.
6	02/01/2018	Pay mandatory state restitution fine of \$150.00 pursuant to Penal Code 1202.4 or Penal Code 1202.4(b).
7	02/01/2018	Pay \$150.00 Probation Revocation Restitution Fine pursuant to Penal Code 1202.44. Restitution fine stayed, to become effective only upon revocation of probation.
8	02/01/2018	Pay \$10.00 plus penalty assessment Local Crime Prevention Fund pursuant to Penal Code 1202.5.
9	02/01/2018	Defendant ordered to report to the Central Collections Department forthwith. Defendant ordered to cooperate with and pay as directed by the Collections Department.
12	02/01/2018	Defendant agrees not to submit any claims to Worker's Comp Carriers for 3 years.
13	02/01/2018	Defendant accepts terms and conditions of probation.
10	02/01/2018	Pay restitution to victim(s) in the amount of \$11,000.00 as to count(s) 2..
11	02/01/2018	Pay \$1,000.00 to the Victim Witness Emergency Fund as to count(s) 2.

Register of Actions:

Date Action	Seq Nbr	Docket Code	Text
04/03/2017	1	FLDOC	Original Complaint filed on 04/03/2017 by Orange County District Attorney.
	2	FLNAM	Name filed: Stanton, Paul Andrew
	3	FLCNT	FELONY charge of 550(a)(6) PC filed as count 1. Date of violation: 06/12/2012.
	4	FLCNT	FELONY charge of 549 PC filed as count 2. Date of violation: 03/30/2014.
	5	FLCNT	FELONY charge of 650 BP filed as count 3. Date of violation: 03/30/2014.
	6	FLCNT	FELONY charge of 550(b)(3) PC filed as count 4. Date of violation: 04/04/2013.
	7	FLCNT	FELONY charge of 550(b)(3) PC filed as count 5. Date of violation: 04/10/2013.
	8	FLCNT	FELONY charge of 550(b)(3) PC filed as count 6. Date of violation: 07/10/2013.
	9	FLCNT	FELONY charge of 550(b)(3) PC filed as count 7. Date of violation: 01/27/2014.
	10	FLCNT	FELONY charge of 550(b)(3) PC filed as count 8. Date of violation: 06/12/2013.
	11	FLCNT	FELONY charge of 550(b)(3) PC filed as count 9. Date of violation: 08/14/2013.
	12	FI959	Accusatory pleading filed by the prosecutor pursuant to Penal Code section 959.1.
	14	FIFCI2	Declaration/Affidavit in Support of Arrest filed.
	15	FIFCI2	Police/Arrest Report filed.
	16	WAARS	Felony Warrant of Arrest requested.
	17	WAWTS	Walk-through warrant submitted for bail amount and signature.
	18	WAWSD	Warrant of Arrest warrant signed by Michael Murray and issued for defendant. Night Service: No. Expedite: Yes. PC 853.6: No. Bail set at \$30,000.00, Mandatory Appearance.
	20	WFNBR	Warrant File Number 03882452 sent from AWSS for Warrant # 3132432.
05/04/2017	1	CLTXT	Defendant requests to be placed on calendar to address warrant
	2	CLCST	Arraignment set on 05/04/2017 at 08:30 AM in Department C55.
	3	HHELD	Hearing held on 05/04/2017 at 08:30:00 AM in Department C55 for Arraignment.

	4	OFJUD	Judicial Officer: Robert A. Knox, Judge
	5	OFJA	Clerk: E. Flores
	6	OFBAL	Bailiff: K. Sun
	7	OFREP	Court Reporter: LaVette Henningham
	8	APDDA	People represented by Shaddi Kamiabipour, Deputy District Attorney, present.
	9	APDWRA	Defendant present in Court with counsel Arendsen, Hamilton Edward, Retained Attorney.
	10	WAREC	Warrant issued on 04/03/2017 ordered recalled for defendant.
	11	CPACK	Counsel acknowledges receipt of the charging document.
	12	WVRAA	Defendant waives reading and advisement of the Original Complaint.
	13	PLNGA	To the Original Complaint defendant pleads NOT GUILTY to all counts.
	14	CLSET	Pre Trial set on 07/13/2017 at 08:30 AM in Department C55.
	15	WVTPH	Court finds the defendant understandingly, knowingly, and voluntarily waives the right to a Preliminary Hearing within 10 court days/60 calendar days of arraignment.
	16	DFOTR	Defendant ordered to return.
	17	FIFPC	Fingerprint card is received and filed.
	18	FISOR	Agreement for Release on Own Recognizance signed and filed.
	19	DSORC	Court orders defendant is to remain released on own recognizance on condition(s): Defendant to book and release by 05/04/17.
	20	OFMCD	Minutes entered by I. Escobedo on 05/04/2017.
	21	FIBAR	Proof of book and release filed.
07/07/2017	1	FITXT	Notice of Appearance and Recommendation by State Licensing Agency Re: Restrictions on Practice of Medicine; Memorandum of Points and Authorities in Support Thereof; Declarations; Exhibits; Proposed Order [Penal Code, Section 23, 1204.5, 1275] filed.
	2	TXRNF	[Proposed] Order Restricting the Practice of Paul Andrew Stanton, M.D., as a Physician and Surgeon [Penal Code, Section 23] received, not filed.
	3	CLCST	Motion set on 07/13/2017 at 08:30 AM in Department C55.
07/13/2017	1	HHELD	Hearing held on 07/13/2017 at 08:30:00 AM in Department C55 for Motion.
	2	HHELD	Hearing held on 07/13/2017 at 08:30:00 AM in Department C55 for Pre Trial.
	3	OFJUD	Judicial Officer: Robert A. Knox, Judge
	4	OFJA	Clerk: N. Rodriguez
	5	OFBAL	Bailiff: K. Sun
	6	OFREP	Court Reporter: LaVette Henningham
	7	APDDA	People represented by Shaddi Kamiabipour, Deputy District Attorney, present.
	8	APTXT	Deputy Attorney General Rosemary F. Luzon present
	9	APDWRA	Defendant present in Court with counsel Arendsen, Hamilton Edward, Retained Attorney.
	10	CLCON	Pre Trial continued to 11/02/2017 at 08:30 AM in Department C55 at request of Defense.
	11	CLCON	Motion continued to 11/02/2017 at 08:30 AM in Department C55 at request of Defense.
	12	DFOTR	Defendant ordered to appear.
	13	WVRTW	Defendant agrees to continue the preliminary hearing and have a preliminary hearing on that date or within a reasonable period of time from that date.
	14	PLCJN	Counsel joins in waivers.
	15	TEXT	Court notes defendant filed book and release on 5-4-17
	16	DSROR	Court orders defendant released on own recognizance.
	17	OFMCD	Minutes entered by M. Johnson on 07/13/2017.
			Certified Copy of Prior Packet mailed to Department Of Consumer Affairs Board Of

09/08/2017	1	CPGTO	Pharmacy,, 1625 N. Market Blvd., Suite N-219, Sacramento, CA 95834-1924/ Jenna Weddle.
09/21/2017	1	CPGTO	Certified Copy of Prior Paceaht mailed to Department Of Consumer Affairs Board Of Pharmacy, 1625 N. Market Blvd., Suite N-219, Sacramento, CA 95834-1924/ Jenna Weddle.
11/02/2017	1	HHELD	Hearing held on 11/02/2017 at 08:30:00 AM in Department C55 for Motion.
	2	HHELD	Hearing held on 11/02/2017 at 08:30:00 AM in Department C55 for Pre Trial.
	3	OFJUD	Judicial Officer: Robert A. Knox, Judge
	4	OFJA	Clerk: N. Rodriguez
	5	OFBAL	Bailiff: K. Sun
	6	OFREP	Court Reporter: LaVette Henningham
	7	APDDA	People represented by Shaddi Kamiabipour, Deputy District Attorney, present.
	8	APATG	People represented by Giovanni Mejia, Deputy Attorney General, present.
	9	APDWRA	Defendant present in Court with counsel Arendsen, Hamilton Edward, Retained Attorney.
	10	CLCON	Pre Trial continued to 12/14/2017 at 08:30 AM in Department C55 at request of Defense.
	11	CLCON	Motion continued to 12/14/2017 at 08:30 AM in Department C55 at request of Defense.
	12	DFOTR	Defendant ordered to return.
	13	WVRTW	Defendant agrees to continue the preliminary hearing and have a preliminary hearing on that date or within a reasonable period of time from that date.
	14	PLCJN	Counsel joins in waivers.
	15	DSOCN	Defendant's release on own recognizance continued.
	16	OFMCD	Minutes entered by A. Eskander on 11/02/2017.
12/14/2017	1	HHELD	Hearing held on 12/14/2017 at 08:30:00 AM in Department C55 for Pre Trial.
	2	HHELD	Hearing held on 12/14/2017 at 08:30:00 AM in Department C55 for Motion.
	3	OFJUD	Judicial Officer: Robert A. Knox, Judge
	4	OFJA	Clerk: N. Rodriguez
	5	OFBAL	Bailiff: K. Sun
	6	OFREP	Court Reporter: LaVette Henningham
	7	APSDA	Raymund Diaz made a special appearance for District Attorney Shaddi Kamiabipour.
	8	APSPC	Christopher Forbes Goodrich makes a special appearance for Hamilton Edward Arendsen, Retained Attorney. Defendant present.
	9	APTXT	Attorney General not present.
	10	CLCON	Pre Trial continued to 01/04/2018 at 09:00 AM in Department C55 at request of Defense.
	11	CLCON	Motion continued to 01/04/2018 at 09:00 AM in Department C55 at request of Defense.
	12	CLTXT	Motion regarding Recommendation by State Licensing Agency Regarding Restrictions on Practice of Medicine.
	13	DFOTR	Defendant ordered to return.
	14	WVRTW	Defendant agrees to continue the preliminary hearing and have a preliminary hearing on that date or within a reasonable period of time from that date.
	15	PLCJN	Counsel joins in waivers.
	16	DSOCN	Defendant's release on own recognizance continued.
	17	OFMCD	Minutes entered by L. Wight on 12/14/2017.
01/04/2018	1	HHELD	Hearing held on 01/04/2018 at 09:00:00 AM in Department C55 for Pre Trial.
	2	HHELD	Hearing held on 01/04/2018 at 09:00:00 AM in Department C55 for Motion.

	3	OFJUD	Judicial Officer: Robert A. Knox, Judge
	4	OFJA	Clerk: N. Rodriguez
	5	OFBAL	Bailiff: K. Sun
	6	OFREP	Court Reporter: LaVette Henningham
	7	APSDA	Charlyn Bender made a special appearance for District Attorney Shaddi Kamiabipour.
	8	APDWRA	Defendant present in Court with counsel Arendsen, Hamilton Edward, Retained Attorney.
	9	CLCON	Pre Trial continued to 02/01/2018 at 09:00 AM in Department C55 at request of Defense.
	10	CLCON	Motion continued to 02/01/2018 at 09:00 AM in Department C55 at request of Defense.
	11	CLTXT	Motion regarding: Recommendation by State Licensing Agency Regarding Restrictions on Praceice of Medicine.
	12	DFOTR	Defendant ordered to return.
	13	WVRTW	Defendant agrees to continue the preliminary hearing and have a preliminary hearing on that date or within a reasonable period of time from that date.
	14	PLCJN	Counsel joins in waivers.
	15	DSOCN	Defendant's release on own recognizance continued.
	16	OFMCD	Minutes entered by L. Wight on 01/04/2018.
02/01/2018	1	HHELD	Hearing held on 02/01/2018 at 09:00:00 AM in Department C55 for Pre Trial.
	2	HHELD	Hearing held on 02/01/2018 at 09:00 AM in Department C55 for Motion.
	3	OFJUD	Judicial Officer: Robert A. Knox, Judge
	4	OFJA	Clerk: N. Rodriguez
	5	OFBAL	Bailiff: K. Sun
	6	OFREP	Court Reporter: LaVette Henningham
	7	APDDA	People represented by Shaddi Kamiabipour, Deputy District Attorney, present.
	8	APDWRA	Defendant present in Court with counsel Arendsen, Hamilton Edward, Retained Attorney.
	9	MOTBY	Motion by People to reduce count 2 pursuant to Penal Code 17(b).
	10	MOTION	Motion granted.
	11	CT17B	Count 2, 549 PC, reduced to misdemeanor pursuant to Penal Code 17(b) at request of People.
	12	TEXT	Court goes off the record.
	13	ADANC	Court advises the defendant as to the nature of the charges.
	14	ADCZS2	The defendant understands that, if he/she is not a citizen of the United States the plea or conviction for the offense(s) charged will have the consequence of deportation, exclusion from admission to the United States, and denial of naturalization pursuant to the laws of the United States.
	15	WAIVES	Defendant waives the following:
	16	WVJCT	- The right to a trial by Court or Jury.
	17	WVRTA	- The right to an Attorney.
	18	WVCXW	-The right to confront and cross-examine witnesses.
	19	WVRSI	- The right against self-incrimination.
	20	PLNGG	Defendant's motion to withdraw plea of NOT GUILTY and enter plea of Guilty as to count(s) 2 of the Original Complaint granted.
	21	PLFWR	Court finds defendant intelligently and voluntarily waives legal and constitutional rights to jury trial, confront and examine witnesses, and to remain silent.
	22	PLFBA	Court finds factual basis and accepts plea.
	23	WVTIM	Defendant waives statutory time for Sentencing.

24	PLRIS	Defendant requests immediate sentencing.
25	FIWWR	Defendant's written waiver of legal and constitutional rights for guilty plea received and ordered filed.
26	ADCRWG	The defendant has been advised of constitutional rights, waivers and consequences in writing pursuant to the guilty plea form. The defendant makes the plea with a full understanding of all the matters set forth in the charging document and in the guilty plea form, that defendant has read, understood and personally initialed each item herein. Defendant understands that the signing and filing of the guilty plea form is conclusive evidence that defendant has pleaded GUILTY to the charges set forth.
27	PRISS	No legal cause why judgment should not be pronounced and defendant having Pled Guilty to count(s) 2, Imposition of sentence is suspended and defendant is placed on 3 Year(s) INFORMAL PROBATION on the following terms and conditions:
28	PRVNL	Violate no law.
29	PROBY	Obey all orders, rules, and regulations, and directives of the Court, Jail, and Probation.
30	PRVNL	Violate no law.
31	PRTNO	Use true name and date of birth only at all times.
32	PRDTC	Disclose terms and conditions of probation when asked by any law enforcement or probation officer.
33	PRSRF	Pay mandatory state restitution fine of \$150.00 pursuant to Penal Code 1202.4 or Penal Code 1202.4(b).
34	PRRFS	Pay \$150.00 Probation Revocation Restitution Fine pursuant to Penal Code 1202.44. Restitution fine stayed, to become effective only upon revocation of probation.
35	SESEC	Pay \$40.00 Court Operations Fee per convicted count pursuant to Penal Code 1465.8.
36	SECCA	Pay Criminal Conviction Assessment Fee per convicted count of \$30.00 per misdemeanor/felony and \$35.00 per infraction pursuant to Government Code 70373(a)(1).
37	PRR10	Pay \$10.00 plus penalty assessment Local Crime Prevention Fund pursuant to Penal Code 1202.5.
38	PROTC	Defendant ordered to report to the Central Collections Department forthwith. Defendant ordered to cooperate with and pay as directed by the Collections Department.
39	PRRST	Pay restitution to victim(s) in the amount of \$11, 000.00 as to count(s) 2..
40	PRTXT	Restitution paid in full.
41	PRVWF	Pay \$1, 000.00 to the Victim Witness Emergency Fund as to count(s) 2.
42	PRCN1	Defendant agrees not to submit any claims to Worker's Comp Carriers for 3 years.
43	PRATC	Defendant accepts terms and conditions of probation.
44	TEXT	Court goes back on the record.
45	MOTBY	Motion by People to dismiss remaining counts.
46	MOTION	Motion granted.
47	CDCDM	Count(s) 1, 3, 4, 5, 6, 7, 8, 9 DISMISSED - Motion of People.
48	APTXT	Appearances for motion:
49	APATG	People represented by Giovanni Mejia, Deputy Attorney General, present.
50	APDWRA	Defendant present in Court with counsel Arendsen, Hamilton Edward, Retained Attorney.
51	MOTION	Motion taken off calendar.
52	DFRPT2	Defendant ordered to report to Victim Witness and Collections forthwith.
53	FXDACT	Collections Referral activity deleted from case.

54	REMRC	Remittance from receipt # 16027670 received in the amount of \$ 259.00.
55	DOJABS	DOJ Initial Abstract sent.